

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 6/23/2020
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**IBE TRADE CORP., a Delaware corporation,  
 and ALEXANDER ROVT,**

**Plaintiffs,**

**v.**

**ALEXANDER ANATOLYEVICH DUBINSKY and  
 TELERADIOKOMPANIA "STUDIA 1+1",  
 a Ukrainian limited liability company,**

**Defendants.**  
 -----X

Case No. 1:20-cv-01666 (MKV)

**STIPULATION AND ORDER EXTENDING TIME OF DEFENDANT  
 TELERADIOKOMPANIA "STUDIA 1+1" TO RESPOND TO PLAINTIFFS' COMPLAINT**

**IT IS HEREBY STIPULATED AND AGREED** by and between counsel for Plaintiffs and counsel for Defendant Teleradiokompania "Studia 1+1" as follows:

1. On or before July 9, 2020, counsel for Defendant Teleradiokompania "Studia 1+1" shall inform counsel for Plaintiffs whether he agrees to waive any defenses as to sufficiency of process and/or service of process of Plaintiffs' Summons and Complaint.
2. The time for Defendant Teleradiokompania "Studia 1+1" to answer or otherwise respond to Plaintiffs' Complaint shall be extended from June 18, 2020 (assuming service of process was effectuated on May 28, 2020) to August 18, 2020.
3. This Stipulation is made without prejudice to and waiver of Defendant Teleradiokompania "Studia 1+1"'s defenses of lack of sufficiency and service of process, personal jurisdiction, *forum non conveniens*, or any other applicable jurisdictional defenses.

**MCDERMOTT WILL & EMERY LLP**

**ARNALL GOLDEN GREGORY LLP**

By: /s/ Neil A. Capobianco  
 Neil A. Capobianco

By: /s/ Richard J. Oparil  
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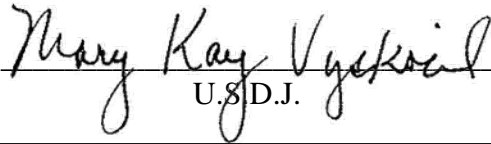
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Teleradiokompania "Studia 1+1"*

The Clerk of Court is respectfully directed to terminate the letter motion pending at docket entry 11.

**SO ORDERED:**

  
U.S.D.J.

Dated: June 23, 2020